

COREY B. BECK, ESQ.
Nevada Bar No. 005870
THE LAW OFFICE OF COREY B. BECK, P.C.
425 South Sixth Street
Las Vegas, Nevada 89101
(702) 678-1999

Attorney for Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re)	
)	BK-S-09-33597-LBR
JILL PAIGE)	Chapter 13
)	
)	HEARING DATE: OST PENDING
Debtor.)	HEARING TIME: OST PENDING
)	
)	

EMERGENCY MOTION TO REIMPOSE STAY

COMES NOW, Debtor, JILL PAIGE ("Debtor"), by and through her attorney, COREY B. BECK, ESQ., hereby filed this Emergency Motion to Reimpose Stay filed on behalf of the Debtor as follows:

1. Debtor filed a Chapter 13 case on December 17, 2009.
2. The Meeting of Creditors was held and concluded on January 26, 2010.
3. Wells Fargo Bank "servicing company" filed a Motion for Relief From Stay originally on February 26, 2010 for 3450 Erva Street property.
4. Wells Fargo Bank obtained an Order Lifting Stay on May 7, 2010 - See Exhibit "1" - Copy of Order.
5. There is a foreclosure sale set for June 29, 2010 at 10:00 AM. See Exhibit "2" Trustee Sale Notice.
6. Undersigned counsel just learned of the Order Lifting Stay and the Trustee Sale. Debtor received a copy of the Trustee Sale Notice via mail.
7. Undersigned counsel has reason to believe there was defect in noticing of the Motion/Order.

8. In particular, Debtor has represented to counsel that the only notice received regarding the Erva Street property was the Notice of Trustee's Sale.
9. In addition, undersigned counsel asserts that our office was not served the Motion and Order Lifting Stay.
10. That the Trustee did not sign the Order is further evidence of defect in Motion/Order.
11. There is a Motion to Value Property set for July 22, 2010.
12. Undersigned counsel asserts there is a valid basis to set aside this Order.
13. That Wells Fargo Bank's secured claim (fair market value of investment property) is provided for in Debtor's Chapter 13 Plan. See Exhibit "4" - Chapter 13 Plan.
14. If the Court grants Debtor's Motion to Value Property then Wells Fargo's claim will be paid through confirmation of the plan.

PRAYER

1. Order immediately reimposing the Automatic Stay.
2. For all other relief the court deems appropriate.

DATED this 22nd day of June, 2010.

/s/ COREY B. BECK, ESQ.
COREY B. BECK, ESQ.
Nevada Bar No. 005870
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425 South Sixth Street
Las Vegas, Nevada 89101
(702)678-1999

Attorney for Debtor